

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

DEIRDRE YOUNG,

Plaintiff,

v.

Case No.: 1:23-cv-00445

WASHINGTON GAS LIGHT COMPANY,

and

TEMPORARY SOLUTIONS, INC.

Defendants.

**DEFENDANT TEMPORARY SOLUTIONS INC.'S
MOTION FOR SUMMARY JUDGMENT**

COMES NOW, Defendant Temporary Solutions, Inc. (“Temporary Solutions”), and, pursuant to Fed. R. Civ. P. 56, submits its Motion for Summary Judgment on the retaliation claim asserted by Plaintiff Deirdre Young (“Plaintiff”) in this lawsuit. As described in more detail in Temporary Solutions’ supporting materials, Plaintiff asserts a single claim for retaliation under 42 U.S.C. § 1981 (“Section 1981”) against Temporary Solutions, a temporary staffing agency, and its client, Defendant Washington Gas Light Company (“Washington Gas”), despite not having a shred of evidence that Temporary Solutions took any adverse action against her or was even involved in the cessation of her placement at Washington Gas.

While the parties dispute the nature of Plaintiff’s complaints directed against her former Washington Gas supervisor, Thomas Robb (“Mr. Robb”), the undisputed facts show that Temporary Solutions had no control over Mr. Robb, had no involvement in Washington Gas’s decision not to bring Plaintiff back from furlough, and took the only corrective action within its control—it offered Plaintiff the opportunity for a new placement. As a staffing agency, Temporary

Solutions can only be liable for either (a) its own retaliatory conduct toward Plaintiff (of which there is none), or (b) Washington Gas' retaliatory conduct that Temporary Solutions knew of and then failed take steps *within its control* to remedy. Plaintiff cannot present any competent evidence supporting either theory of liability. Understanding that Plaintiff otherwise cannot establish multiple elements of her claim against either Defendant, Temporary Solutions is entitled to judgment as a matter of law given its non-involvement in the only events at issue.

In support of this Motion, Temporary Solutions relies upon its Memorandum of Law in Support of its Motion for Summary Judgment as well as supporting declarations, depositions, and other evidence. As evidenced by these materials and all evidence of record, Plaintiff's claim is without merit and Temporary Solutions respectfully requests that the Court enter judgment in its favor and dismiss Plaintiff's claim with prejudice.

[Signatures of counsel on following page]

Respectfully submitted this 12th day of March, 2024.

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*Attorneys for Defendant Temporary Solutions,
Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2024, I filed the foregoing Temporary Solutions, Inc.'s Motion for Summary Judgment using the Court's CM/ECF system, which will send a notice of electronic filing to all parties of record.

Dated: March 12, 2024.

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